



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2023 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

JUAN CARLOS CRUZ RAMOS,
aka "Ivan Cortes Ramirez,"
aka "Cornelio Ortiz Ramos,"
DAVID CRUZ HERNANDEZ, and
BERTA MONTANO JIMENEZ,

Defendants.

CR No. 2:23-CR-00382 (A) -FLA

F I R S T
S U P E R S E D I N G
I N D I C T M E N T

[18 U.S.C. § 371: Conspiracy;
18 U.S.C. § 922(a)(1)(A): Engaging
in the Business of Dealing in and
Manufacturing Firearms Without a
License; 18 U.S.C. § 922(e):
Delivery of Firearms to Carrier
Without Written Notice; 18 U.S.C.
§ 922(g)(5): Unlawful Shipment of
Firearms by an Alien; 18 U.S.C.
§ 924(d)(1) and 28 U.S.C.
§ 2461(c): Criminal Forfeiture]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 371]

[ALL DEFENDANTS]

A. INTRODUCTORY ALLEGATION

At times relevant to this Indictment, defendants JUAN CARLOS
CRUZ RAMOS, also known as ("aka") "Ivan Cortes Ramirez," aka

1 "Cornelio Ortiz Ramos," DAVID CRUZ HERNANDEZ, and BERTA MONTANO
2 JIMENEZ, did not have a federal firearms license issued by the United
3 States Bureau of Alcohol, Tobacco, Firearms, and Explosives ("ATF"),
4 and thus were not licensed to import, manufacture, or deal in
5 firearms.

6 B. OBJECTS OF THE CONSPIRACY

7 Beginning on an unknown date, but no later than on or about
8 March 2022, and continuing until at least on or about July 20, 2023,
9 in Los Angeles County, within the Central District of California, and
10 elsewhere, defendants CRUZ RAMOS, CRUZ HERNANDEZ, and MONTANO JIMENEZ
11 knowingly conspired with others known and unknown to the Grand Jury
12 to commit the following offenses against the United States:

13 1. Engaging in the Business of Dealing in Firearms Without a
14 License, in violation of Title 18, United States Code,
15 Section 922(a)(1)(A); and

16 2. Delivering Firearms to a Carrier Without Written Notice, in
17 violation of Title 18, United States Code, Section 922(e).

18 C. MANNER AND MEANS OF THE CONSPIRACY

19 The objects of the conspiracy were to be accomplished, in
20 substance, as follows:

21 1. Defendants CRUZ RAMOS and MONTANO JIMENEZ would control
22 multiple premises, including a storage unit, to manufacture hundreds
23 of AR-15-style firearms.

24 2. Defendant CRUZ RAMOS would manufacture firearms, including
25 AR-15-style firearms, to sell to customers.

26 3. Through text messages and phone calls, defendant CRUZ RAMOS
27 and other co-conspirators would negotiate the sale of the firearms to
28 customers located in Mexico.

1 4. Through text messages, defendants CRUZ RAMOS and CRUZ
2 HERNANDEZ would coordinate the pickup and delivery of parts used to
3 manufacture and assemble firearms, including AR-15-style firearms.

4 5. Defendants CRUZ RAMOS and MONTANO JIMENEZ and other co-
5 conspirators would package firearms for shipment to customers,
6 including customers located in Mexico.

7 6. Defendants CRUZ RAMOS, CRUZ HERNANDEZ, and MONTANO JIMENEZ
8 would transport and deliver parcels containing firearms to freight
9 forwarding companies for shipment to firearms customers located in
10 Mexico.

11 7. The co-conspirators would submit false invoices to the
12 freight forwarding companies, claiming that the gun shipments
13 contained normal household items such as clothes, shoes, and
14 blankets.

15 8. Through text messages and phone calls, defendants CRUZ
16 RAMOS and CRUZ HERNANDEZ would coordinate the payment for the parcels
17 containing firearms.

18 9. Defendants CRUZ RAMOS and MONTANO JIMENEZ would coordinate
19 the pickup and receipt of proceeds from the sale of firearms from gun
20 buyers located in Mexico.

21 10. Defendant CRUZ RAMOS would cause payments to be made to
22 defendant CRUZ HERNANDEZ for his role in the gun trafficking
23 conspiracy.

24 D. OVERT ACTS

25 On or about the following dates, in furtherance of the
26 conspiracy and to accomplish its objects, defendants CRUZ RAMOS, CRUZ
27 HERNANDEZ, and MONTANO JIMENEZ, and others known and unknown to the
28 Grand Jury, committed various overt acts within the Central District

1 of California, and elsewhere, including, but not limited to, the
2 following:

3 Overt Act No. 1: On March 14, 2022, in text messages,
4 defendant MONTANO JIMENEZ sent defendant CRUZ RAMOS a photograph of
5 an order for firearms parts, including upper receivers for AR-style
6 firearms.

7 Overt Act No. 2: On April 11, 2022, in text messages,
8 defendant MONTANO JIMENEZ sent defendant CRUZ RAMOS two photographs
9 depicting pistols and rifles with the name of a firearms customer in
10 Oaxaca, Mexico.

11 Overt Act No. 3: On June 12, 2022, in a text message,
12 defendant MONTANO JIMENEZ sent defendant CRUZ RAMOS a photograph
13 depicting information for a storage unit where the co-conspirators
14 stored firearms parts.

15 Overt Act No. 4: Between at least November 2022 and
16 continuing until July 20, 2023, defendant CRUZ RAMOS controlled a
17 social media account labeled, "Business Calls Only," and registered
18 to a Mexican telephone number which he used to communicate with his
19 co-conspirators, including defendants CRUZ HERNANDEZ and MONTANO
20 JIMENEZ.

21 Overt Act No. 5: On December 2, 2022, in text messages using
22 coded language, defendant CRUZ RAMOS told defendant CRUZ HERNANDEZ
23 that he had picked up firearm parts from Southern California on
24 December 1, 2022.

25 Overt Act No. 6: Between December 2, 2022 and December 7,
26 2022, in text messages using coded language, defendants CRUZ RAMOS
27 and CRUZ HERNANDEZ coordinated defendant CRUZ HERNANDEZ' pick up of
28 additional firearm parts in the Central District of California.

1 Overt Act No. 7: On December 3, 2022, defendant CRUZ
2 HERNANDEZ picked up firearms parts from a location within the Central
3 District of California.

4 Overt Act No. 8: On December 7, 2022, at a freight forwarding
5 company located in Canoga Park, California, defendant CRUZ HERNANDEZ
6 or another co-conspirator dropped off three boxes that each contained
7 firearms and paid for them to be shipped to a firearms customer
8 located in Oaxaca, Mexico.

9 Overt Act No. 9: On December 20, 2022, in a text message,
10 defendant CRUZ RAMOS sent defendant CRUZ HERNANDEZ a photograph
11 depicting multiple AR-15 firearm parts.

12 Overt Act No. 10: On January 14, 2023, in text messages,
13 defendants CRUZ RAMOS and CRUZ HERNANDEZ discussed manufacturing an
14 AR-15-style lower receiver.

15 Overt Act No. 11: On February 26, 2023, in text messages,
16 defendant CRUZ RAMOS sent defendant CRUZ HERNANDEZ a photograph
17 depicting a receipt for a wire transfer to defendant CRUZ HERNANDEZ
18 in the amount of \$2,026 that was sent Oaxaca, Mexico as payment for
19 guns.

20 Overt Act No. 12: On March 15, 2023, defendant MONTANO JIMENEZ
21 or another co-conspirator traveled from Sanger, California, to Canoga
22 Park, California, to ship two boxes containing multiple AR-15-style
23 firearms.

24 Overt Act No. 13: On March 15, 2023, at a freight forwarding
25 company located in Canoga Park, California, defendant MONTANO JIMENEZ
26 or another co-conspirator dropped off two boxes that each contained
27 multiple AR-15-style firearms and paid to ship the boxes to a
28 firearms customer located in Oaxaca, Mexico.

1 Overt Act No. 14: On April 5, 2023, defendant CRUZ HERNANDEZ
2 traveled from North Highlands, California to Canoga Park, California,
3 transporting four boxes that each contained multiple AR-15-style
4 rifles.

5 Overt Act No. 15: On April 5, 2023, defendant CRUZ HERNANDEZ
6 dropped off four boxes containing firearms at a freight forwarding
7 company located in Canoga Park, California, and paid to ship them to
8 a firearms customer in Oaxaca, Mexico.

9 Overt Act No. 16: On April 6, 2023, defendant CRUZ HERNANDEZ
10 texted defendant CRUZ RAMOS photographs depicting a parcel addressed
11 to a firearms customer in Oaxaca, Mexico and the associated invoice.

12 Overt Act No. 17: On or before May 11, 2023, defendants CRUZ
13 RAMOS and MONTANO JIMENEZ packaged and concealed six AR-15-style
14 rifles and magazines inside a parcel for shipment to a gun buyer
15 located in Oaxaca, Mexico.

16 Overt Act No. 18: On May 11, 2023, defendant CRUZ RAMOS and
17 another co-conspirator traveled from Sanger, California to Los
18 Angeles, California, to ship a box that contained six AR-15-style
19 rifles to a firearms customer located in Oaxaca, Mexico.

20 Overt Act No. 19: On May 11, 2023, defendant CRUZ RAMOS
21 dropped off the box referenced in Overt Act No. 18 at a freight
22 forwarding company located in Pacoima, California, and paid for the
23 parcel to be shipped to a firearms customer located in Oaxaca,
24 Mexico.

25 Overt Act No. 20: On May 8, 2023, defendant CRUZ HERNANDEZ
26 drove to Redwood City, California to purchase a cardboard box from a
27 freight forwarding company.

1 Overt Act No. 21: On May 17, 2023, defendant CRUZ HERNANDEZ
2 traveled from North Highland, California to Redwood City, California,
3 transporting a box containing five AR-15-style rifles.

4 Overt Act No. 22: On May 17, 2023, defendant CRUZ HERNANDEZ
5 dropped off the box referenced in Overt Act No. 20 containing five
6 firearms at a freight forwarder in Redwood City, California, and paid
7 for it to be shipped to a gun buyer in Oaxaca, Mexico.

8 Overt Act No. 23: On May 20, 2023, defendant CRUZ RAMOS texted
9 defendant CRUZ HERNANDEZ a photograph depicting a bank deposit slip
10 showing the deposit of ₱50,000 Mexican Pesos into a co-conspirator's
11 account.

12 Overt Act No. 24: On May 20, 2023, in response to the text
13 message referenced in Overt Act No. 23, defendant CRUZ HERNANDEZ
14 stated, "Thank you."

15 Overt Act No. 25: On May 23, 2023, defendant CRUZ RAMOS texted
16 defendant CRUZ HERNANDEZ a photograph depicting a bank deposit slip
17 showing the deposit of ₱141,000 Mexican Pesos into a co-conspirator's
18 account.

19 Overt Act No. 26: On June 4, 2023, in text messages using
20 coded language, defendant CRUZ HERNANDEZ told defendant CRUZ RAMOS
21 that someone at the border wanted to buy "toys," referring to
22 firearms.

23 Overt Act No. 27: On June 4, 2023, in coded text messages,
24 defendant CRUZ HERNANDEZ asked defendant CRUZ RAMOS to send him
25 photographs of the "toys" when defendant CRUZ RAMOS had them.

26 Overt Act No. 28: On June 4, 2023, in response to the text
27 message referenced in Overt Act No. 27, defendant CRUZ RAMOS
28 confirmed he would send the requested photographs.

1 Overt Act No. 29: On June 5, 2023, in text messages, defendant
2 CRUZ RAMOS sent defendant CRUZ HERNANDEZ photographs depicting AR-15-
3 style rifles.

4 Overt Act No. 30: On June 5, 2023, in text messages, defendant
5 CRUZ HERNANDEZ told defendant CRUZ RAMOS that he forwarded to his
6 brother the photographs that defendant CRUZ RAMOS sent.

7 Overt Act No. 31: On June 6, 2023, in text messages, defendant
8 CRUZ RAMOS provided a cell phone number he controlled to defendant
9 CRUZ HERNANDEZ and described that cell phone number as the number of
10 the "Juana Vasquez" parcel.

11 Overt Act No. 32: On June 8, 2023, in a text message,
12 defendant CRUZ RAMOS sent defendant CRUZ HERNANDEZ a photograph of a
13 bank deposit slip in the amount of ₱41,000 Mexican Pesos into a co-
14 conspirator's account.

15 Overt Act No. 33: On June 14, 2023, defendants CRUZ RAMOS and
16 MONTANO JIMENEZ traveled from Sanger, California to Los Angeles,
17 California, transporting a cardboard box containing five AR-15-style
18 rifles for shipping to a gun buyer located in Oaxaca, Mexico.

19 Overt Act No. 34: On June 14, 2023, defendants CRUZ RAMOS and
20 MONTANO JIMENEZ dropped off the box containing concealed firearms
21 referenced in Overt Act No. 33 at a freight forwarding company
22 located in Los Angeles, California, and paid for the parcel to be
23 shipped to a gun buyer located in Oaxaca, Mexico.

24 Overt Act No. 35: On June 15, 2023, in a text message,
25 defendant CRUZ RAMOS sent defendant CRUZ HERNANDEZ a photograph
26 depicting a fully assembled AR-15-style rifle.

27 Overt Act No. 36: On June 15, 2023, in response to the
28 photograph depicting the firearm referenced in Overt Act No. 35,

1 defendant CRUZ HERNANDEZ stated that the rifle was "chingona," or
2 "badass."

3 Overt Act No. 37: On June 15, 2023, in a text messages,
4 defendants CRUZ RAMOS and CRUZ HERNANDEZ discussed defendant CRUZ
5 RAMOS firing several of the firearms the co-conspirators
6 manufactured, including machineguns.

7 Overt Act No. 38: On June 16, 2023, in a text message,
8 defendant CRUZ HERNANDEZ told defendant CRUZ RAMOS that he contacted
9 a freight forwarding company to inquire about a gun parcel that had
10 been shipped to Oaxaca, Mexico.

11 Overt Act No. 39: On June 16, 2023, in text messages,
12 defendants CRUZ RAMOS and CRUZ HERNANDEZ discussed contacting a
13 freight forwarder to get information about a parcel containing
14 firearms.

15 Overt Act No. 40: On June 30, 2023, in text messages,
16 defendant CRUZ RAMOS sent defendant CRUZ HERNANDEZ a photograph
17 containing a list of names and identifiers the co-conspirators used
18 to ship gun parcels to Mexico, and advised defendant CRUZ HERNANDEZ
19 that the list contained people being investigated by law enforcement
20 for shipping illegal items.

21 Overt Act No. 41: On July 4, 2023, in a text message,
22 defendant CRUZ RAMOS sent defendant MONTANO JIMENEZ a photograph
23 depicting a wire transfer sent to defendant MONTANO JIMENEZ in the
24 amount of \$1,633.65 from a gun buyer located in Oaxaca, Mexico.

25 Overt Act No. 42: On July 5, 2023, in text messages, defendant
26 CRUZ RAMOS sent defendants MONTANO JIMENEZ and CRUZ HERNANDEZ a
27 screenshot of a news story about law enforcement intercepting a
28 shipment of firearms wrapped in clothing.

1 Overt Act No. 43: On July 5, 2023, in text messages,
2 defendants CRUZ HERNANDEZ and CRUZ RAMOS discussed how the clothing
3 in the boxes would arrive without the firearms, but that another box
4 containing firearms should arrive.

5 Overt Act No. 44: On July 6, 2023, in a text message,
6 defendant CRUZ RAMOS sent defendant CRUZ HERNANDEZ a photograph
7 depicting a wire transfer receipt from a co-conspirator in Oaxaca,
8 Mexico, that was sent to defendant CRUZ HERNANDEZ in the amount of
9 approximately \$1,634.

10 Overt Act No. 45: On July 6, 2023, in text messages, defendant
11 CRUZ RAMOS sent defendant MONTANO JIMENEZ photographs depicting wire
12 transfer receipts from co-conspirators in Oaxaca, Mexico.

13 Overt Act No. 46: On July 20, 2023, defendants CRUZ RAMOS and
14 MONTANO JIMENEZ possessed firearm manufacturing equipment at one of
15 their residences located in Sanger, California.

16 Overt Act No. 47: On July 20, 2023, inside of a storage unit
17 controlled by defendants CRUZ RAMOS and MONTANO JIMENEZ, the co-
18 conspirators possessed numerous firearms, including a Kalashnikov
19 1947, 7.62 mm rifle, bearing serial number 1972EH4389; a Century
20 Arms, model AK-47, 7.62 mm rifle, bearing serial number SV7086669;
21 three privately manufactured AR-15-style rifles, bearing invalid
22 serial numbers (otherwise known as "ghost guns"); a Winchester, model
23 70, .243 caliber bolt action rifle, bearing serial number G323180; a
24 CVA, model Optima Elite, .50 caliber single-shot rifle, bearing
25 serial number 61-13-071099-06; a Glock, model 43, 9mm caliber pistol,
26 bearing serial number ABTA325 containing six rounds of ammunition;
27 263 AR-15-style upper receivers; 553 AR-15-style lower receivers
28 bearing invalid serial numbers; 383 AR-style high-capacity magazines;

1 more than 8,000 rounds of ammunition; and hundreds of additional
2 firearm parts and other material used to manufacture firearms.

3 Overt Act No. 48: On July 20, 2023, at his residence located
4 in North Highlands, California, defendant CRUZ HERNANDEZ possessed
5 five privately manufactured AR-15-style rifles wrapped in foil and
6 clothing in a cardboard box, ammunition, and a Hi-Point Firearms,
7 model 995, 9mm caliber rifle, bearing serial number F198382.

8 Overt Act No. 49: On July 21, 2023, in an intercepted
9 telephone call, defendant CRUZ RAMOS asked another co-conspirator to
10 check on the storage unit.

COUNT TWO

[18 U.S.C. §§ 922(a)(1)(A), 2(a)]

[ALL DEFENDANTS]

Beginning on an unknown date, but no later than March 2022, and continuing to on or about July 20, 2023, in Los Angeles County, within the Central District of California, and elsewhere, defendants JUAN CARLOS CRUZ RAMOS, also known as ("aka") "Ivan Cortes Ramirez," aka "Cornelio Ortiz Ramos," DAVID CRUZ HERNANDEZ, and BERTA MONTANO JIMENEZ, and others known and unknown to the Grand Jury, each aiding and abetting the others, not being licensed importers, manufacturers, or dealers of firearms, willfully engaged in the business of dealing in firearms, specifically, the conduct described in Overt Acts Nos. 1 through 49 of Count One of this Indictment, which are re-alleged and incorporated here.

COUNT THREE

[18 U.S.C. §§ 922(e), 2(a)]

[ALL DEFENDANTS]

On or about March 15, 2023, in Los Angeles County, within the Central District of California, and elsewhere, defendants JUAN CARLOS CRUZ RAMOS, also known as ("aka") "Ivan Cortes Ramirez," aka "Cornelio Ortiz Ramos," DAVID CRUZ HERNANDEZ, and BERTA MONTANO JIMENEZ, each aiding and abetting the others, knowingly delivered and caused to be delivered to a common carrier, namely, a freight forwarding company located in Canoga Park, California, for transportation and shipment in interstate and foreign commerce, to a person other than a licensed importer, manufacturer, dealer, and collector, a package containing the following firearms, without written notice to the carrier that such firearms were being transported and shipped: multiple privately manufactured AR-style rifles, bearing no serial number (commonly referred to as "ghost guns").

COUNT FOUR

[18 U.S.C. §§ 922(e), 2(a)]

[ALL DEFENDANTS]

On or about April 5, 2023, in Los Angeles County, within the Central District of California, and elsewhere, defendants JUAN CARLOS CRUZ RAMOS, also known as ("aka") "Ivan Cortes Ramirez," aka "Cornelio Ortiz Ramos," DAVID CRUZ HERNANDEZ, and BERTA MONTANO JIMENEZ, each aiding and abetting the others, knowingly delivered and caused to be delivered to a common carrier, namely, a freight forwarding company located in Canoga Park, California, for transportation and shipment in interstate and foreign commerce, to a person other than a licensed importer, manufacturer, dealer, and collector, a package containing the following firearms, without written notice to the carrier that such firearms were being transported and shipped: multiple privately manufactured AR-style rifles, bearing no serial number (commonly referred to as "ghost guns").

COUNT FIVE

[18 U.S.C. §§ 922(e), 2(a)]

[ALL DEFENDANTS]

On or about May 11, 2023, in Los Angeles County, within the Central District of California, and elsewhere, defendants JUAN CARLOS CRUZ RAMOS, also known as ("aka") "Ivan Cortes Ramirez," aka "Cornelio Ortiz Ramos," DAVID CRUZ HERNANDEZ, and BERTA MONTANO JIMENEZ, each aiding and abetting the others, knowingly delivered and caused to be delivered to a common carrier, namely, a freight forwarding company located in Pacoima, California, for transportation and shipment in interstate and foreign commerce, to a person other than a licensed importer, manufacturer, dealer, and collector, a package containing the following firearms, without written notice to the carrier that such firearms were being transported and shipped: six privately manufactured AR-style rifles, bearing no serial number (commonly referred to as "ghost guns").

COUNT SIX

[18 U.S.C. §§ 922(e), 2(a)]

[ALL DEFENDANTS]

On or about June 14, 2023, in Los Angeles County, within the Central District of California, and elsewhere, defendants JUAN CARLOS CRUZ RAMOS, also known as ("aka") "Ivan Cortes Ramirez," aka "Cornelio Ortiz Ramos," DAVID CRUZ HERNANDEZ, and BERTA MONTANO JIMENEZ, each aiding and abetting the others, knowingly delivered and caused to be delivered to a common carrier, namely, a freight forwarding company located in Los Angeles, California, for transportation and shipment in interstate and foreign commerce, to a person other than a licensed importer, manufacturer, dealer, and collector, a package containing the following firearms, without written notice to the carrier that such firearms were being transported and shipped: five privately manufactured AR-style rifles, bearing no serial number (commonly referred to as "ghost guns").

COUNT SEVEN

[18 U.S.C. § 922(g)(5)]

[DEFENDANT CRUZ HERNANDEZ]

On or about April 5, 2023, in Los Angeles County, within the Central District of California, and elsewhere, defendant DAVID CRUZ HERNANDEZ knowingly shipped firearms, namely, approximately 20 privately manufactured AR-style rifles, bearing no serial number (commonly referred to as "ghost guns"), in interstate and foreign commerce, namely, from Canoga Park, California, addressed to a recipient in Oaxaca, Mexico, and intercepted in Laredo, Texas.

Defendant CRUZ HERNANDEZ shipped such firearms knowing that he was then an alien illegally and unlawfully in the United States.

COUNT EIGHT

[18 U.S.C. § 922(g)(5)]

[DEFENDANT CRUZ RAMOS]

On or about May 11, 2023, in Los Angeles County, within the Central District of California, and elsewhere, defendant JUAN CARLOS CRUZ RAMOS, also known as ("aka") "Ivan Cortes Ramirez," aka "Cornelio Ortiz Ramos," knowingly shipped firearms, namely, approximately six privately manufactured AR-style rifles, bearing no serial number (commonly referred to as "ghost guns"), in interstate and foreign commerce, namely, from Los Angeles, California, addressed to a recipient in Oaxaca, Mexico.

Defendant CRUZ RAMOS shipped such firearms knowing that he was then an alien illegally and unlawfully in the United States.

FORFEITURE ALLEGATION

[18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), in the event of any defendant's conviction of the offenses set forth in any of Counts Two through Eight of this Indictment.

2. Any defendant so convicted shall forfeit to the United States of America the following:

(a) All right, title, and interest in any firearm or ammunition involved in or used in any such offense; and

(b) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), the convicted defendant shall forfeit substitute property, up to the value of the property described in the preceding paragraph if, as the result of any act or omission of said defendant, the property described in the preceding paragraph or any portion thereof (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been

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1 substantially diminished in value; or (e) has been commingled with
2 other property that cannot be divided without difficulty.

3
4 A TRUE BILL

5 /s/
6 _____
Foreperson

7 E. MARTIN ESTRADA
United States Attorney

8 MACK E. JENKINS
9 Assistant United States Attorney
Chief, Criminal Division

10
11 *Christina Shy for SMG*

12 SCOTT M. GARRINGER
Assistant United States Attorney
13 Deputy Chief, Criminal Division

14 BENEDETTO L. BALDING
Assistant United States Attorney
15 Deputy Chief, General Crimes
Section

16 KELLY LAROCQUE
17 THOMAS MAGAÑA
Assistant United States Attorneys
18 General Crimes Section